

From: [John Wilder](#)
To: [Gary Moore/R6/USEPA/US@EPA](#)
Cc: [Rafael Casanova/R6/USEPA/US@EPA](#); [Phyllis Primrose](#)
Subject: Re: Offshore Specialty Fabricators/Falcon Refinery
Date: 01/07/2003 04:00 PM

Gary, Thanks for your response. Under our program, the person would be required to investigate and perform any response action under our risk based rules called Texas Risk Reduction Program, which does have some pre-calculated protective levels used to determine completeness of investigation and the need for a response action. From what little I know, it seems some surface water assessment may be appropriate. As the case is re-assigned on this end, we will keep in touch as we determine the need to issue a directive to Offshore Specialty Fabricators, and request EPA inform us upon determination to include or exclude the pipeline release on Offshore Specialty Fabricators property.

Thanks again
John

>>> <Moore.Gary@epamail.epa.gov> 01/07/03 12:33PM >>>

John/Phillis:

EPA is currently discussing how it wants to handle the off-facility piping associated with the old Falcon Refinery (aka NORCO). At this point, we are not exactly sure. We would like to handle it as part of the removal action Administrative Order on Consent (AOC). The piping that enters onto Offshore Specialty Products property is believed to be part of the old refinery piping to the old dock facility. I believe that any way we look at it, Offshore Specialty Products will have some responsibility at least for the releases from the piping that enters on their land for which I believe they have evacuated as well as removed any visibly contaminated soils. I do not believe that they have removed the piping nor do I know if they did any type of significant flushing of the lines to insure no future releases. I think you guys need to keep the potential for a corrective action open but we will try to address this through the remedial process. I do not have any analytical on the materials that they evacuated from the lines. How would you guys typically handle the corrective action activities? Would you have them sample the soils near the piping and then determine if a cleanup is necessary? Do you have pre-established cleanup criteria for various chemicals?

In Conclusion, I think you should keep the RCRA Corrective Action File open on this one until we can resolve how we want to do this.

Thanks

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To: Gary Moore/R6/USEPA/US@EPA

cc: Phyllis Primrose <PPRIMROS@tceq.state.tx.us>

Subject: Offshore Specialty Fabricators/Falcon

Refinery

01/07/2003 10:11

AM

Good Morning Gary,

I work in the Corrective Action Section, Remediation Division of the TCEQ central office and am evaluating a referral from our Corpus Christi Region 14 office regarding a pipeline release discovered 8/02 from a line on property owned by Offshore Specialty Fabricators, which is located across Sunray Road from the former Falcon Refinery.

In speaking to Melissa Cordell of our Site Assessment group, it seems there is the potential that the release may be viewed as part of the Falcon Refinery proposed superfund site. Could you please provide me current EPA thought on if the pipeline release is being pursued as part of the Falcon Refinery case.

I am currently in the process of transferring to other duties, so please respond to Phyllis Primrose as well as myself.

Regards,
John



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(See attached file: John Wilder.vcf)